

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	CASE NO. 10-06239 (SEK)
MARIA DEL P. FIGUEROA Debtor	CHAPTER 13

RESPONSE TO DEBTOR'S OBJECTION TO CLAIM #4-1

TO THE HONORABLE COURT:

NOW COMES Scotiabank de Puerto Rico, (Scotiabank),
through counsel, and most respectfully **STATES** and
PRAYS:

1. On or about October 14, 2010, Debtor filed an objection to the claim filed by appearing party.
2. In summary Debtor objects \$90.00 worth of inspections plus legal fees for a total amount \$2,500.00.
3. Relative the inspections we are submitting evidence of all inspections fees at \$15.00 for a total amount of \$60.00 which reflects a reduction of the amount claimed and the proof

of claim will be amended accordingly. See Exhibit "A".

4. Relative to the legal fees they correspond to: legal fees for bankruptcy case 09-10544 \$600.00, legal fees relative to this bankruptcy \$640.00, fees relative to filing of foreclosure action as per Exhibit "B" \$1,315.50 for a total of \$2,555.50 as claimed in the proof of claim.

WHEREFORE it is respectfully requested that this Motion BE GRANTED, and accordingly objection to claim number 4-1 be denied because we have provided sufficient evidence in support of claim, with such further relief as is deemed appropriate under the circumstances.

I CERTIFY, that on this same date, I electronically filed the foregoing with the Clerk of this Court via CM/ECF system, which will electronically send notification of such filing to the following to: **Mr. Jose M. Prieto Carballo; Mr.**

Alejandro Oliveras Rivera; and Ms. Monsita Lecaroz
Arribas.

In San Juan, Puerto Rico, this 18, day of
November, 2010.

Wallace Vazquez Sanabria-125101
17 Mexico St., Suite D-1
San Juan, PR 00917-2202
Tel: 787-756-5730
Fax: 787-764-0340
Email: walvaz@prtc.net

Wallace Vazquez Sanabria
Counselor at Law
17 Mexico Street, Suite D-1
San Juan, Puerto Rico 00917-2202
Phone (787) 756-5730, Fax (787) 764-0340
E-mail: walvaz@prtc.net

R-G Mortgage Corporation 200
Property Inspection Report Request - Collections Department

January 2, 2009

R-G Number : 1387169
Due Date : 12/01/2008 Amount Due: 1,272.60

Mortgagors : MARIA D FIGUEROA-CABALLERO
URB EL PLANTIO

Address : CALLE ICACO A 165-D
TOA BAJA PR 00949

Property : 165 ICACO URB.EL PLANTIO
Address : TOA BAJA, PR 00949

Phone : 787-251-6809 787-597-4704

Occupancy Status: / /Borrower / /Vacant / /Rented
/ /Adverse / /Unable / /New Owner

Occupancy Comments: _____

Contact: / /Yes / /No Letter Left: / /Yes / /No

Person Interviewed : Off. Perez

Reason for Delinquency: no autoriz el acceso.

Proposal to bring account current: _____

Property Conditions : / /Poor / /Fair / /Good

Property Description : / /Duplex / /Two Levels / /One Level

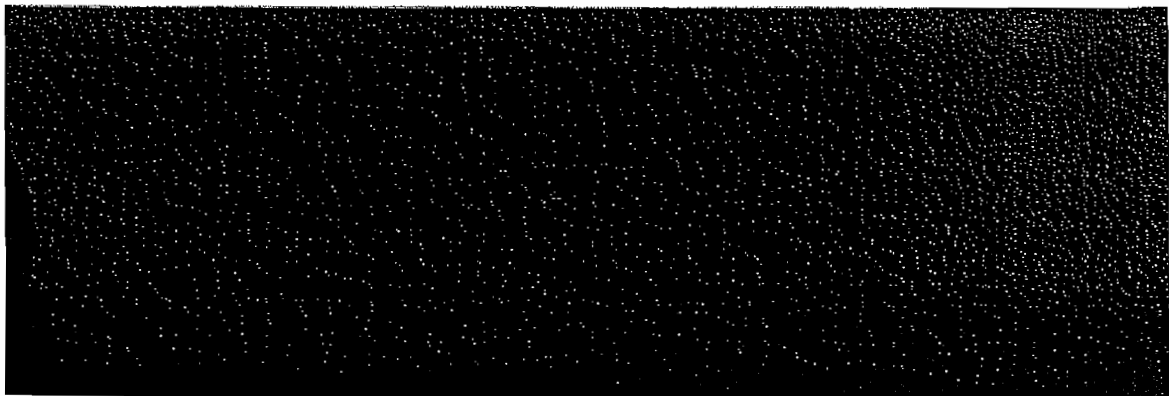
Date of Inspection : 11/9/09

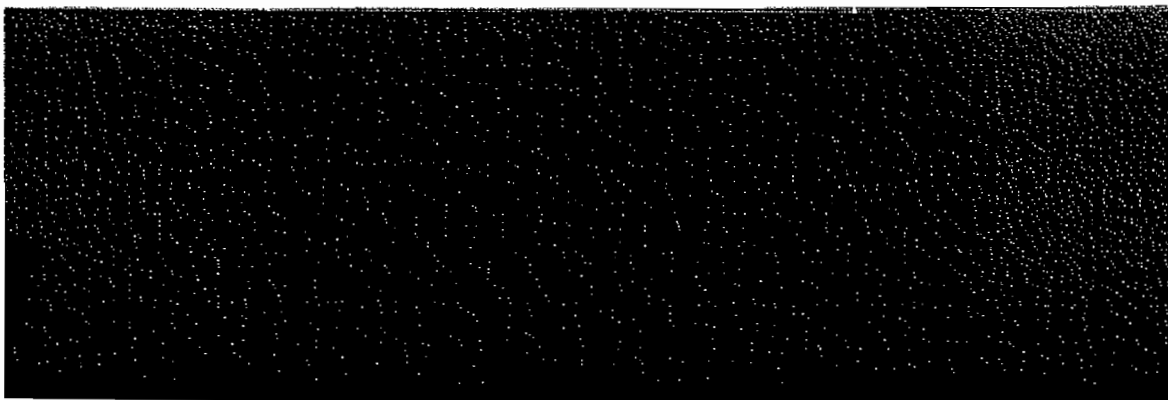
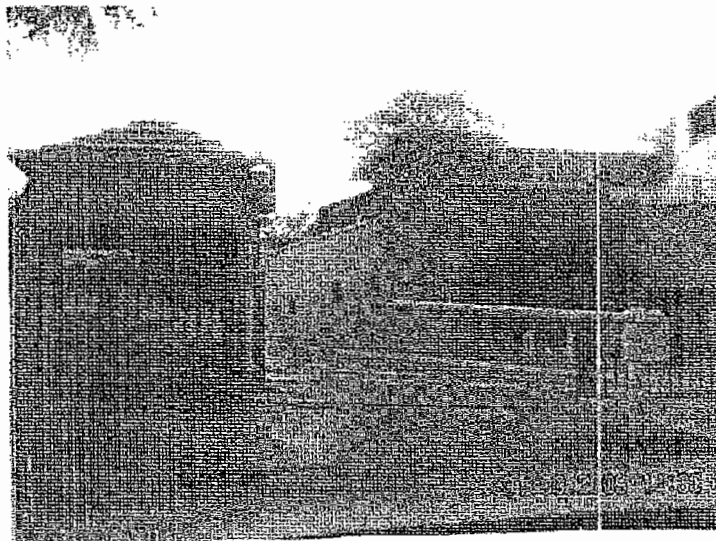
Hour : 2:23

Inspector Name : James E. Yde

/ / Inspection was not possible
/ / Gate Community / /Security Officer / / Verify Address

Mortgagor's Signature: _____





R-G Mortgage Corporation 200
Property Inspection Report Request - Collections Department

March 3, 2009

0555

R-G Number : 1387169
Due Date : 01/01/2009 Amount Due: 1,313.00

Mortgagors : MARIA D FIGUEROA-CABALLERO
URB EL PLANTIO

Address : CALLE ICACO A 165-D
TOA BAJA PR 00949

Property : 165 ICACO URB.EL PLANTIO
Address : TOA BAJA, PR 00949

Phone : 787-251-6809 787-597-4704

Occupancy Status: / /Borrower / /Vacant / /Rented
/ /Adverse / /Unable / /New Owner

Occupancy Comments:

Contact: / /Yes / /No Letter Left: / /Yes / /No

Person Interviewed : OFF. Ortiz

Reason for Delinquency: NO Autorizo el acceso

Proposal to bring account current:

Property Conditions : / /Poor / /Fair / /Good

Property Description : / /Duplex / /Two Levels / /One Level

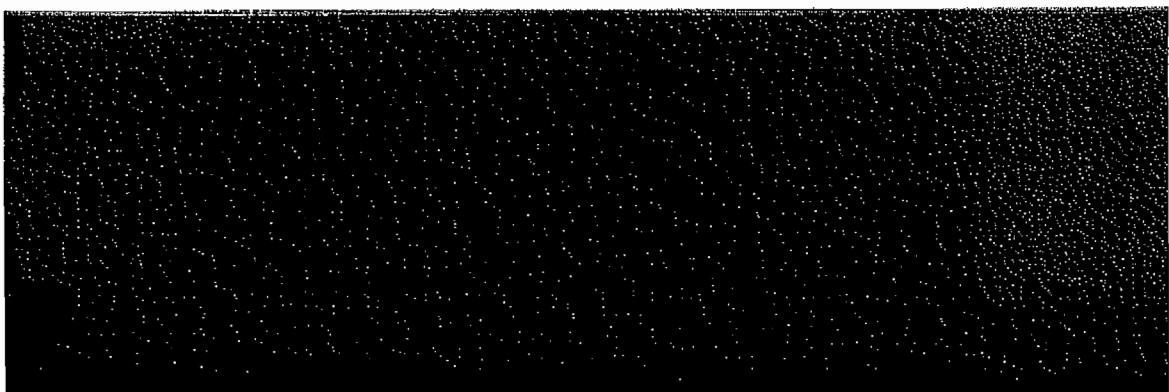
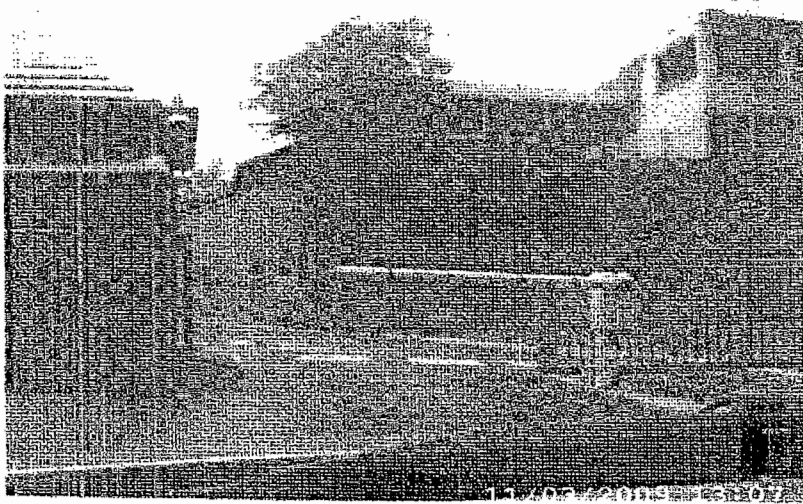
Date of Inspection : 4/13/09

Hour : 1:17

Inspector Name : J. E. Ortiz

/ / Inspection was not possible
/ / Gate Community / / Security Officer / / Verify Address

Mortgagor's Signature:



R-G Mortgage Corporation
Property Inspection Report Request - Collections Department

200

*Corregido
de J.*

April 2, 2009

0378

R-G Number : 1387169
Due Date : 02/01/2009 Amount Due: 1,333.20

Mortgagors : MARIA D FIGUEROA-CABALLERO
URB EL PLANTIO

Address : CALLE ICACO A 165-D
TOA BAJA PR 00949

Property : 165 ICACO URB.EL PLANTIO
Address : TOA BAJA, PR 00949

Phone : 787-251-6809 787-597-4704

Occupancy Status: / /Borrower / /Vacant / /Rented
/ /Adverse / /Unable / /New Owner

Occupancy Comments: _____

Contact: / /Yes / /NO Letter Left: / /Yes / /NO

Person Interviewed : _____

Reason for Delinquency: _____

*prop ubicada en CONTRA
de ACOSO, Gdía de Seg. NO dejó pasar.*

Proposal to bring account current: _____

Property Conditions : / /Poor / /Fair / /Good

Property Description : / /Duplex / /Two Levels / /One Level

Date of Inspection : _____

Hour : _____

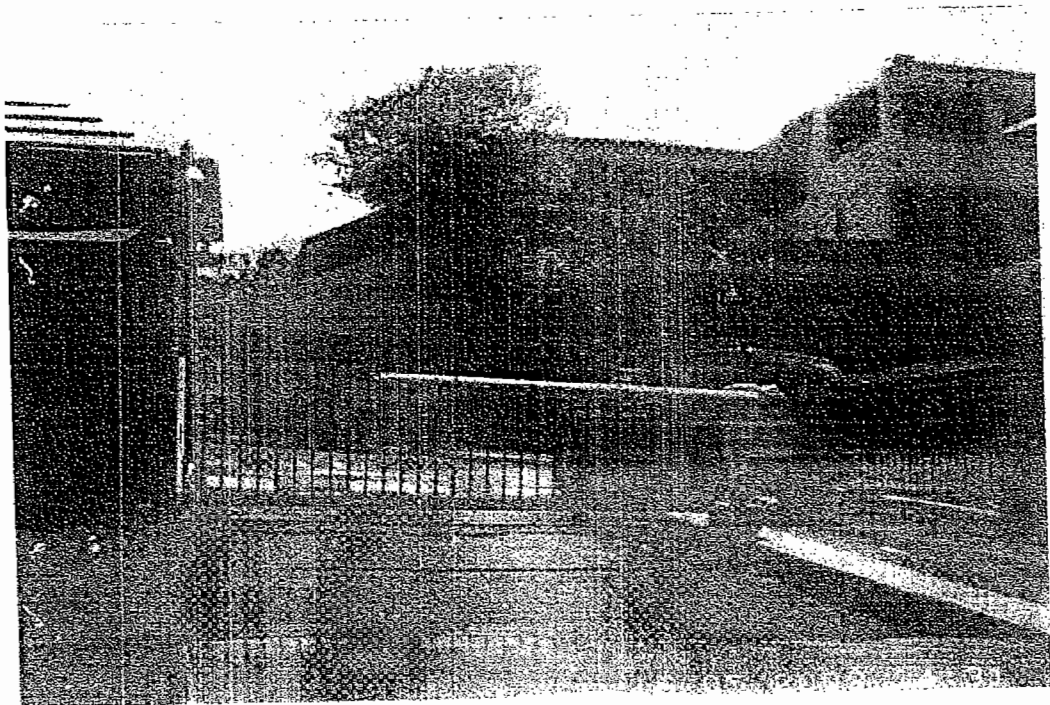
Inspector Name : _____

/ / Inspection was not possible

/ / Gate Community / / Security Officer / / Verify Address

Mortgagor's Signature: _____

W



R&G MORTGAGE CORPORATION

INSPECTION REPORT

0746

LOAN NO. 0001387169

Name: MARIA D FIGUEROA CABALLERO

Loan Type: CONV Ref No.

Property 165 ICACO

Inspector:

Address: URB.EL PLANTIO

Investor: 036 R-G PREMIER

Lawyer: 027 VAZQUEZ VIZCARRONDO

TOA BAJA

00949

Contested ☐

Last Legal Action: 05/29/2009 RefRev

Date			Property		Remarks
Month	Day	Year	Status	Condition	
7	17	09	Occupied by Owner	Excellent	Prop. blanca y peach club. Frances Lopez 2 nices, portafino. el cristal. 12:51
			Occupied by Tenant	Good	
			Vacant	Regular	
			Abandoned	Poor	
			Unknown		

Inspected by:



LAW OFFICES

VAZQUEZ & VIZCARRONDO LLP

P.O. BOX 195389, SAN JUAN
PUERTO RICO, 00919-5389

TELEPHONE: (787) 758-6895
FAX: (787) 751-1038
758-7818

#142
D
4 de marzo de 2010

R& #:1387169

R&G PREMIER BANK OF PUERTO RICO

ETAPA- ORDEN & MAND. EJEC. DE SENTENCIA FILE NO. 4343-1636

QUIEBRA

HONORARIOS PROFESIONALES por la tramitación del caso
contra **MARIA D. FELICIANO CABALERO**, sobre Ejecución de
Hipoteca por la Vía Ordinaria. Tribunal Superior de Puerto Rico,
Sala de Toa Alta.

\$ 650.00

DESEMBOLSOS

Radicación Demanda.....	41.00
Certificar Demanda.....	2.50
Emplazamientos.....	75.00
Comprobante Anotación Aviso Demanda Registro...	14.50
Comprobante Cancelación Aviso Demanda Registro...	14.50
Presentar Anotación Aviso Demanda Registro y	
Presentar Cancelación Aviso Demanda Registro y.....	
Certificar Orden y Mand. Can. Aviso Demanda.....	100.00
Declaración Jurada R&G Deuda.....	20.00
Certificación Registral.....	25.00
Sellos Mociones.....	18.00
Sellos Correo.....	25.00
Copias Xerox.....	20.00
Estudio de Título.....	60.00

TOTAL.....

\$ 415.50 ✓

\$ 1,065.50 ✓

RBB